

Exhibit A

Feldstein, Robyn

From: Collignon, Casie
Sent: Friday, April 05, 2024 6:54 PM
To: Frank Hedin
Cc: Arun Ravindran; Feldstein, Robyn
Subject: RE: Cameras v. PCH - Amended Complaint

It is lie. And, your email below demonstrates why you are playing games. You admit that there is not “necessarily” another office because there isn’t one. If you had a good faith basis, you would tell me what that “office” is or your good faith basis to think that there might be. But you don’t. You just keep playing word games. Businesses don’t have secret offices that cannot be located by the public. Thus, you are using a lie to create a factual dispute. That is not appropriate.

If you lie to the Court, that is your choice. Your call.

Casie

Casie Collignon
BakerHostetler
T +1.303.764.4037

From: Frank Hedin <fhedin@hedinllp.com>
Sent: Friday, April 5, 2024 4:48 PM
To: Collignon, Casie <ccollignon@bakerlaw.com>
Cc: Arun Ravindran <aravindran@hedinllp.com>; Feldstein, Robyn <rfeldstein@bakerlaw.com>
Subject: Re: Cameras v. PCH - Amended Complaint

“At least one” does not mean there is another one necessarily. What is so controversial about this?

Frank S. Hedin
Hedin LLP
1395 Brickell Avenue, Suite 1140
Miami, Florida 33131
(305) 357-2107
<http://www.hedinllp.com>

On Apr 5, 2024, at 6:46 PM, Collignon, Casie <ccollignon@bakerlaw.com> wrote:

Games? If you have a basis to allege that there is an office other than the registered agent, please let us know. It is simply not appropriate to make us guess what “other” office you believe is out there when that knowledge, if it was true, is obviously available in the public knowledge.

Have a nice weekend.

Casie

Casie Collignon

<image001.png>

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From: Frank Hedin <fhedin@hedinllp.com>

Sent: Friday, April 5, 2024 4:43 PM

To: Collignon, Casie <ccollignon@bakerlaw.com>

Cc: Arun Ravindran <aravindran@hedinllp.com>; Feldstein, Robyn <rfeldstein@bakerlaw.com>

Subject: Re: Cameras v. PCH - Amended Complaint

We're filing a motion tonight because we're sick of the games. Alleging that your client has at least one office in Utah when we know of one (overseen by its registered agent) is appropriate.

Frank S. Hedin

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On Apr 5, 2024, at 6:37 PM, Collignon, Casie <ccollignon@bakerlaw.com> wrote:

Frank –

It is a lie and you know it. They have zero PCH offices in UT. They have zero employees in UT. I am happy to get you an affidavit on this, or any other topic you want. I asked you for your factual basis for any allegation that PCH has an office in Utah, and you have none. Your only response is that you want to go on a discovery fishing expedition to find out. That is not Rule 11 sufficient. That is the exact opposite. In sum, you are admitting you have no factual basis, but that merely filing a lawsuit allows you the right to conduct discovery to figure out if you had a good faith basis to file the lawsuit in the first instance. That is not accurate or an appropriate use of court/party resources.

PCH has a registered agent in UT as is required by law when you are an out of state business with NO offices in Utah. And, that registered agent has an office in Utah. While we may have a good faith legal dispute about whether a registered agent office is a PCH office (although I believe that is a legally ridiculous argument, and already subject to our current MTD briefing), there is absolutely no dispute that there are zero *PCH* offices in Utah.

Once again, what is your Rule 11 basis to allege that PCH has an office in addition to its registered agent's office? Are you honestly stating that PCH has some office that is hidden from the public record? That is ridiculous and you know it.

To be clear, I don't want anyone jammed up on timing. I am happy to stipulate to another extension to allow us to continue to work (as you just sent me the new amendment today). But, if you file, we are reserving all rights to bring this knowingly baseless allegation to the Court.

If a conversation would help, just let me know.

Thanks,

Casie

Casie Collignon

<image001.png>

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From: Frank Hedin <fhedin@hedinllp.com>
Sent: Friday, April 5, 2024 4:22 PM
To: Collignon, Casie <ccollignon@bakerlaw.com>
Cc: Arun Ravindran <aravindran@hedinllp.com>; Feldstein, Robyn <rfeldstein@bakerlaw.com>
Subject: Re: Cameras v. PCH - Amended Complaint

It's not a lie to say defendant has at least one office there because we know of 1 and there may be others. What am I missing here?

Frank S. Hedin

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On Apr 5, 2024, at 5:55 PM, Collignon, Casie <ccollignon@bakerlaw.com> wrote:

Yes. Our registered agent has an office there. One office. If you have any facts otherwise, please let us know. That is a reasonable request. Otherwise, it's a lie.

Sorry; always happy to try to cooperate where I can.

Casie Collignon
BakerHostetler
303-764-4037

Sent from my iPhone

On Apr 5, 2024, at 3:51 PM, Frank Hedin <fhedin@hedinllp.com> wrote:

Saying you have at least one office in Utah is a lie? Ok
good luck explaining that one to the court without violating
rule 11. We'll file a motion

Frank S. Hedin

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On Apr 5, 2024, at 4:15 PM, Collignon,
Casie <ccollignon@bakerlaw.com>
wrote:

Ok. I understand. We have a right to ask
you for your Rule 11 basis for a fact that
we know is a lie. You haven't provided
any. I offered to submit a declaration that
no discovery could possibly show an
office or any employees there. It is simply
improper for you to amend your
complaint with facts known to be a lie to
avoid our motion to dismiss.

Again, happy to consider other options
here, but we just can't consent to an
amendment with a lie that can be
confirmed.

Always happy to discuss.

Casie Collignon
BakerHostetler
303-764-4037

Sent from my iPhone

On Apr 5, 2024, at
11:19 AM, Frank Hedin
<fhedin@hedinllp.com>
wrote:

We are being
reasonable here. If
your client won't agree
to my proposal below
we will file a motion
for leave to file this,

which will cost your client money to respond to and cost the court time to prepare an order granting.

Frank S. Hedin
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Fax: [+ 1 \(305\) 200-8801](tel:+13052008801)

From: Frank Hedin
<fhedin@hedinllp.com>

Date: Friday, April 5, 2024 at 1:16 PM

To: Collignon, Casie
<ccollignon@bakerlaw.com>, Arun
Ravindran
<aravindran@hedinllp.com>

Cc: Feldstein, Robyn
<rfeldstein@bakerlaw.com>

Subject: Re:
Cameras v. PCH -
Amended Complaint

How about we change it to say “at least one”? If it has no other offices, then discovery will reveal that to be the case and that’ll be the end of it. But the fact of the matter is that it’s registered to do business in Utah, but we are unable to ascertain the extent of those business activities given the informational

disadvantage we are
at in that regard.

Frank S. Hedin
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From: Collignon,
Casie
<ccollignon@bakerlaw.com>
Date: Friday, April 5,
2024 at 1:11 PM
To: Arun Ravindran
<aravindran@hedinllp.com>, Frank
Hedin
<fhedin@hedinllp.com>
Cc: Feldstein, Robyn
<rfeldstein@bakerlaw.com>
Subject: RE:
Cameras v. PCH -
Amended Complaint

Arun – Received and
working with the client
now. The issue is that
this proposed
Complaint now states
that PCH has “one or
more” offices, including
but not limited to its
registered agent’s
office. This is simply not
factually accurate for all
of the reasons we have
already explored. What
is your factual basis to
allege “or more”? My
client simply cannot
consent to an
amendment which

contains a knowingly
factual inaccurate
allegation.

Happy to keep working
together if you have any
good faith basis to
allege that we have any
"office" in UT beyond
it's registered agent's
office (which is not a
PCH office).

Thanks for the
cooperation.

Best,

Casie

Casie Collignon
<image002.png>

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From: Arun Ravindran
<aravindran@hedinllp.com>

Sent: Friday, April 5,
2024 8:18 AM

To: Collignon, Casie
<ccollignon@bakerlaw.com>; Frank Hedin
<fhedin@hedinllp.com>

Cc: Feldstein, Robyn
<rfeldstein@bakerlaw.com>

Subject: Re: Cameras v.
PCH - Amended
Complaint

Hello Cassie,

Please see the
attached revised
proposed First
Amended
Complaint. The
Complaint is identical
to the one we sent last
week but deletes
allegations in
paragraphs 8 and 65

that PCH has
employees who work
from Utah. Please
advise if we have
Defendant's consent
under Fed. R. Civ. P.
15(a)(2) to file. Our
filing deadline is
today, so your prompt
response would be
very much
appreciated.

Thanks very much,

Arun G. Ravindran
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